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Attorneys for Rabo AgriFinance LLC

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
AMARILLO DIVISION**

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| In re: MCCLAIN FEED YARD, INC., et al., Debtors. | CASE NO. 23-20084-swe7 (Jointly Administered Cases) |
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| <p>In re:</p> <p>2B FARMS, a Texas General Partnership, et al., Debtors.</p> <p>AGTEXAS FARM CREDIT SERVICES, AGTEXAS, PCA and THORLAKSON DIAMOND T FEEDERS, LP,</p> <p>Plaintiffs,</p> <p>EDWARD DUFURRENA et al., Intervenor Plaintiffs,</p> <p>v.</p> <p>RABO AGRIFINANCE LLC et al., Defendants.</p> | <p>CASE NO. 23-50096-swe12 (Jointly Administered Cases)</p> <p>ADVERSARY NO. 24-02007-swe (Consolidated Adversary Proceeding)</p> |
| <p>HTLF BANK, as successor to FIRST BANK & TRUST,</p> <p>Plaintiff, Counter-Defendant, and Cross-Claim Defendant,</p> <p>v.</p> <p>2B FARMS, a Texas General Partnership, TERRY M. ROBINSON, and REBECCA A. ROBINSON,</p> <p>Defendants, Counterclaim-Plaintiffs, Third-Party Plaintiffs and Third-Party Counterclaim Defendants,</p> <p>v.</p> <p>RABO AGRIFINANCE LLC and MECHANICS BANK,</p> | <p>ADVERSARY NO. 24-02007-swe (Consolidated Adversary Proceeding)</p> |

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| <p>Third-Party Defendants and, as to Rabo AgriFinance LLC only, Third-Party Counterclaim Plaintiff and Cross-Claim Plaintiff.</p> <p>HTLF BANK, as successor to FIRST BANK & TRUST,</p> <p>Plaintiff and Counter-Defendant,</p> <p>v.</p> <p>2B FARMS, a Texas General Partnership, TERRY M. ROBINSON, and REBECCA A. ROBINSON,</p> <p>Defendants and Counter-Plaintiffs.</p> | |
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**STATEMENT TO THE COURT PURSUANT TO ORDER ENTERED JULY 29, 2025
[Dkt. 201]**

TO THE HONORABLE SCOTT EVERETT, UNITED STATES BANKRUPTCY COURT JUDGE:

Pursuant to the Court's Order Granting in Part and Denying in Part the Trustee's Motion to Intervene and Enforce the Automatic Stay [Dkt. 201] (the "**Order**"), Rabo AgriFinance LLC ("**Rabo**"), through counsel, respectfully files the below statement as required by the terms of the Order:

ORDER QUESTION 1: The case name, case number, date, and docket number of the party's prior jury demand or position on bankruptcy jurisdiction, including as required by Federal Rules of Bankruptcy Procedure 7008, 7012(b), 9027(a)(1)(B), or 9027(e)(3).

RESPONSE: No prior formal jury demand has been asserted by Rabo. Furthermore, Rabo has consented to core jurisdiction and to the entry of final orders and judgments in this consolidated adversary proceeding as evidence by Rabo's execution of the Joint Stipulation filed on August 19, 2025, as Dkt. 206.

ORDER QUESTION 2: In compliance with any obligation under Federal Rules of Bankruptcy Procedure 7008, 8012(b), 9027(a)(1)(B), or 9027(e)(3), if such party has not previously complied.

ANSWER: Rabo has consented to core jurisdiction and to the entry of final orders and judgments in this consolidated adversary proceeding as evidence by Rabo's execution of the Joint Stipulation filed on August 19, 2025, as Dkt. 206.

QUESTION 3: Identify the case name, Proof of Claim number, date, and dollar amount of each Proof of Claim filed by the party in any of the above-captioned bankruptcy cases.

ANSWER: Rabo has filed the following Proofs of Claim in the above-captioned bankruptcy cases:

| Case Number | Claim Number | Date of Filing | Amount |
|-------------|--------------|----------------|-----------------|
| 23-20084 | 56 | 9/13/2023 | \$53,516,988.33 |
| 23-20085 | 57 | 9/13/2023 | \$53,516,988.33 |

| | | | |
|----------|----|-----------|-----------------|
| 23-20086 | 52 | 9/13/23 | \$53,516,988.33 |
| 23-50096 | 12 | 8/10/2023 | Unliquidated |
| 23-50097 | 13 | 8/10/2023 | Unliquidated |

DATED: August 20, 2025.

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/s/ Michael R. Johnson

Michael R. Johnson
Attorneys for Rabo AgriFinance LLC

CERTIFICATE OF SERVICE

I hereby certify that on August 20, 2025, the foregoing document was filed with the Clerk of the Court using the CM/ECF system, which sent notice of electronic filing to all electronic filing users in this case.

/s/ Michael R. Johnson _____
Michael R. Johnson

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